Applicants request favorable reconsideration and withdrawal of the objection and rejections set forth in the Office Action in view of the foregoing amendments and the following remarks.

Initially, the Office Action objects to the Specification of the present application on the grounds that there is no explicit mention of a "computer readable storage medium." In response, Applicants have amended the Specification so as to now explicitly recite a "computer readable storage medium." Applicants submit that this amendment does not introduce new matter because, although not expressly recited in the original disclosure, several portions of the originally-filed Specification implicitly indicated that a computer readable storage medium would store the disclosed executable programs, including paragraph 0050 wherein the amendment adds the express recitation of a computer readable storage medium. Correspondingly, the Office Action does not indicate that the previous amendment which introduced the recitation of the computer readable storage medium in claim 1 raises an issue of new matter. Thus, Applicants submit the objection to the Specification has been overcome and should be withdrawn.

Claims 1-5, 7, 8, and 10-13 remain pending in the application, with Claims 1 and 13 being independent. Claims 1 and 13 have been amended herein. Support for the amendments can be found throughout the originally-filed disclosure, including, for example, at paragraph 0040 of the Specification. Thus, Applicants submit the amendments include no new matter.

Claim 13 is rejected in the Office Action under 35 U.S.C. § 103(a) as being unpatentable over <u>Candella et al.</u> (U.S. Patent Application Pub. No. 2005/0021476) in view of

French et al. (U.S. Patent Application Pub. No. 2003/0033526). Claims 1-5, 7, 8, and 10-12 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Bansal et al. (U.S. Patent Application Pub. No. 2003/0120593) in view of Candella et al., and further in view of Benson et al. (U.S. Patent Application Pub. No. 2004/0225632).

Applicants respectfully traverse the rejections. Nevertheless, without conceding the propriety of the rejections and solely to expedite prosecution of the application, Applicants have amended independent claims 1 and 13 so as to clarify the distinctions between the cited references and the claimed invention. To this end, Applicants submit independent claims 1 and 13 are patentably distinguishable over the cited references, for at least the following reasons.

With respect to independent claim 13, the Office Action cites Candella et al. as disclosing a method for facilitating maintenance of relationships between a user identity and an account related to the user identity. The Office Action asserts the method of Candella et al. includes, inter alia, assigning a positive weight for a transaction that is deemed a successful confirmation of a relationship between the user identity and the account, as well as assigning a negative weight for a transaction that is deemed an unsuccessful confirmation of a relationship between the user identity and the account. The Office Action further asserts that Candella et al. discloses aggregating the positive and negative weights to determine a usage history of a user identity.

Applicants submit, however, that Candella et al. fails to disclose or suggest "assigning a negative weight for a particular series of unsuccessful confirmations of the relationships between [a] user identity with [an] account that is greater than a sum of individual negative weights of unsuccessful confirmations of the relationships that make up the particular series of

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unsuccessful confirmation of the relationships between [the] user identity with [the] account" as recited in amended independent claim 13. For example, while Candella et al. appears to disclose a risk scoring algorithm that increases a risk score in response to a purchaser giving incorrect answers regarding personal information such as their address, at no point does Candella et al. suggest that the risk scoring algorithm aggregates a plurality of incorrect answers and increases the risk score by more than the individual incorrect answers. See, e.g., Candella et al., paragraphs 32, 35, 36, and 38. In other words, while Candella et al. appears to disclose that each incorrect answer increases the score by some amount, Candella et al. does not suggest that the incorrect answers can be combined to increase the score by an amount beyond the sum of their amounts.

Applicants further submit the secondary citation to French et al. fails to cure the deficiencies of Candella et al. The Office Action cites French et al. as suggesting to determine a likelihood a user is correctly associated with a user identity and using the likelihood with a hierarchical scheme of registration. Applicants submit, however, that French et al. fails to disclose or suggest anything relating to assigning a negative weight for a particular series of unsuccessful confirmations of the relationships, as recited in independent claim 13.

For at least the foregoing reasons, Applicants submit that Candella et al. and French et al., whether taken individually or collectively, fail to suggest the method recited in amended independent claim 13.

With respect to independent claim 1, the Office Action cites Bansal et al. as disclosing a computer system for facilitating management of user identifies. The Office Action acknowledges, however, that Bansal et al. does not disclose assigning a negative weight for an

unsuccessful transaction by an identity associated with an account. Correspondingly, Applicants submit that <u>Bansal et al.</u> fails to disclose an audit component that assigns a negative weight for a particular series of unsuccessful transactions by an identity associated with the account, as recited in amended claim 1.

Applicants further submit the secondary citations to <u>Candella et al.</u> and <u>Benson et al.</u> fail to cure the deficiencies of <u>Bansal et al.</u> with respect to claim 1.

As discussed above in conjunction with claim 13, <u>Candella et al.</u> does not disclose or suggest assigning a negative weight for a particular series of unsuccessful confirmations of a relationships between a user identity with an account. Similarly, Applicants submit <u>Candella et al.</u> does not disclose or suggest an audit component configured to assign a negative weight for a particular series of unsuccessful transactions by an identity associated with an account that exceeds a sum of individual negative weights of unsuccessful transactions that make up the particular series of unsuccessful transactions by the identity associated with the account, as recited in amended claim 1.

<u>Benson et al.</u> is cited in the Office Action as disclosing an automated information management system that includes a servicing component configured to facilitate maintaining and modifying information relating to an identity. Applicants submit, however, that <u>Benson et al.</u> fails to disclose or suggest anything relating audit component which assigns a negative weight for a particular series of unsuccessful transactions, as recited in amended claim 1.

For at least the foregoing reasons, Applicants submit that <u>Bansal et al.</u>, <u>Candella et al.</u>, and <u>Benson et al.</u>, whether taken individually or collectively, fail to suggest the method recited in independent claim 1.

The remaining claims in this application are dependent claims which depend directly or indirectly from claim 1, and are therefore patentable for the reasons note above with respect to claim 1. In addition, each of the dependent claims recites features of the invention still further distinguishing it from the applied references. Favorable and independent consideration thereof is respectfully sought.

In view of the foregoing amendments and remarks, Applicants respectfully request favorable reconsideration and passage to issue of the present application.

Any fee required in connection with this paper should be charged to Deposit Account No. 06-1205.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

/Donald H. Heckenberg, Jr./

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Donald H. Heckenberg, Jr.
Attorney for Applicants
Registration No. 60,081

FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York 10112-3801
Facsimile: (212) 218-2200
DHH/ntb

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